

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS DAVID E. WILLIAMS
(APWU/USPS-T1 1-4)
(December 22, 2011)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness David E. Williams (USPS-T-1). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

As used in these interrogatories, the terms listed below are defined as follows:

The term "document" means all writings of any kind, including the originals and all copies, whether different from the originals by reason of any notations made on such copies or otherwise (including without limitation correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, summaries, pamphlets, books, interoffice and intraoffice communications, offers, notations of any sort of conversations such as telephone calls, meetings or other communications, bulletins, computer printouts, teletypes, telefaxes, worksheets, and all drafts, alterations, modifications changes and amendments of any kind to the foregoing); graphic or oral records or representations of any kind (including without limitation photographs, charts, graphs, microfiche, microfilm, videotape recordings, motion pictures); and electronic, mechanical or electrical records or representations of any kind (including without limitation e-mails, computer files, tapes, cassettes, discs, recordings).

The term "all documents" means every document as above defined known to

USPS and every such document which can be located or discovered by reasonably diligent efforts.

The term "Postal Service" includes all agents, employees, attorneys, representatives, and anyone acting on its behalf, as well as the Board of Governors, contractors and subcontractors to the Postal Service, and the Postal Service Office of Inspector General (OIG).

The term "person" means any natural person, corporation, partnership, proprietorship, association, organization or group of natural individuals.

The term "identify," when used with regard to a person means to provide the full name, position, address and telephone number of the person.

The term "identify," when used with regard to a document means to describe the subject matter of the document, its author, its date and any addressee.

For each interrogatory response, identify all individuals responsible for providing the response who will be able to confirm the response under oath.

For any objection to or other refusal to answer any portion of any interrogatory, provide all information requested by that portion of the request to which there is no objection, or which an answer is not refused. If an objection is made to an interrogatory on the ground that it is too broad, provide all information determined by USPS to be discoverable. If an objection is made to an interrogatory on the ground that to provide the requested discovery would constitute an undue burden, provide all requested documents that can be supplied without undertaking what is claimed an undue burden. For those portions of any interrogatory to which an objection is raised, or which a complete answer is otherwise refused, state each reason for the objection or declination. If an objection is made to any portion of any interrogatory on the ground that it seeks privileged or otherwise non-discoverable information, state the privilege or other protection asserted, identify all persons to whom the document that is claimed to be non-discoverable have been communicated or displayed, and identify all documents that constitute, contain or reflect such information; and provide a separate list of all asserted privileged documents that identifies the author, recipient date and general subject matter of each document.

In any instance where a response to an interrogatory cannot be provided in full, so state and then respond to that portion of the interrogatory to which USPS can respond.

You should supplement the responses to answers to these interrogatories in accordance with the provisions of Rule 26(e) of the Federal Rules of Civil Procedure.

Respectfully submitted,

Darryl J. Anderson
Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T1-1 On page 10 of your testimony you state “The Postal Service has determined that, in order for the planned mail processing consolidations to generate significant cost savings, changes to the existing inter-plant transportation must be made that necessitate changes to existing service standards.”

- a) Has the Postal Service assessed whether some subset of the consolidations and transportation changes proposed under this plan could take place that would reduce costs but also allow most of the current service standards to be maintained?
- b) If so, what did that assessment show?
- c) If the assessment in a) has not been done, why has it not been done?

APWU/USPS-T1-2 Mr. Masse’s testimony indicates that the Postal Service anticipates it could save, on net, \$2.1 billion per year from a full implementation of this plan. However, past experience indicates not all the AMP studies will produce recommendations to consolidate.

- a) How much does the Postal Service actually expect to save once the AMPs have been fully evaluated?
- b) Do you expect the anticipated loss (2.9 billion pieces and \$0.5 billion in contribution) to be reduced if fewer facilities are consolidated?

APWU/USPS-T1-3 On page 9 of your testimony you state that the Postal Service is planning this fundamental realignment of the mail processing network “while also meeting its obligation to provide regular and effective levels of mail service.”

- a) What is the Postal Service’s definition of regular and effective levels of mail service?
- b) Is it your testimony that the objective and factors in §3622 are met solely by the Postal Service providing regular and effective levels of mail service?
- c) Please address how this proposal is consistent with each of the following: §3622 (b) (3), §3622 (b) (5), §3622 (b) (8), §3622 (c) (1), §3622 (c) (7), §3622 (c) (8), §3622 (c) (9), §3622 (c) (11), and §3622 (c) (13)?
- d) Please address how this proposal is consistent with each of the following: §3691 (b) (1) (A and C), and §3691 (c) (1 and 2),

APWU/USPS-T1-4 On page 9 of your testimony you indicate that the fundamental realignment of the mail processing network is being planned to “utilize capital assets and personnel more efficiently over the long-run.” How much redundancy are you planning for this system in order to provide Postal Service customers with “delivery reliability, speed and frequency consistent with reasonable rates and best business practices.”